

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.: 0:22-cv-61009-RS

EDGAR QUINTERO,

Plaintiff,

v.

HEALTHCARE REVENUE RECOVERY
GROUP LLC D/B/A ARS ACCOUNT
RESOLUTION SERVICES,

Defendant.

**PROPOSED SCHEDULING ORDER SETTING
CIVIL TRIAL DATE AND PRETRIAL SCHEDULE**

THIS CAUSE is set for trial during the Court's two-week trial calendar beginning on [mm/dd/yyyy]. If the case cannot be tried during the two-week period, it will be re-set for each successive trial calendar until it is tried or resolved. The **Calendar Call** will be held at **9:00 a.m. on Tuesday, [mm/dd/yyyy]**. The parties shall adhere to the following schedule:

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|--|-------------------|
| 1. Joinder of any additional parties and filing of a motion to amend the complaint by | September 1, 2022 |
| 2. Parties shall select a mediator pursuant to Local Rule 16.2 and shall schedule a time, date, and place for mediation by | July 22, 2022 |
| 3. Plaintiffs shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by | August 19, 2022 |

4. Defendant(s) shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by September 19, 2022
5. Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2) by September 27, 2022
6. Written lists containing the names and addresses of all fact witnesses intended to be called at trial by November 18, 2022
7. Fact discovery shall be completed by December 16, 2022
8. Expert discovery shall be completed by December 16, 2022
9. Mediation shall be completed by November 4, 2022
10. deposition designations and counter-designations shall be filed by April 10, 2023
The Parties shall meet and confer prior to submitting the deposition and counter-designations in a good faith effort to resolve the objections
11. All pretrial motions and memoranda of law, including motions *in limine*. *Prior to any motion in limine, the parties shall meet and confer in good faith. If a party has multiple motions in limine, they shall file as a single omnibus motion. All motions in limine and the responses shall be limited to one page per issue. No replies shall be permitted.* May 5, 2023
12. Joint pretrial stipulation, proposed joint jury instructions, proposed joint verdict form, and/or proposed findings of fact and conclusions of law shall be filed by May 12, 2023
When the parties cannot agree on specific jury instructions, the submitted instructions shall clearly indicate which party has proposed the specific instruction.

Dated this **15th day of July 2022.**

/s/ Alejandro E. Figueroa

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